

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

ELISABETH CLEVELAND, on behalf of herself and all others similarly situated, <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> WHIRLPOOL CORPORATION, <p style="text-align: center;">Defendant.</p>	<p style="text-align: right;">Case No. 20-cv-1906(WMW/KMM)</p> <p style="text-align: center;">JOINT STIPULATION TO STAY DEFENDANT WHIRLPOOL CORPORATION'S ANSWER DEADLINE</p>
--	--

IT IS HEREBY STIPULATED AND AGREED by the parties, through their respective counsel, subject to the approval of the Court, that Defendant Whirlpool Corporation's deadline to answer Plaintiff's First Amended Class Action Complaint (Doc. 25) shall be stayed pending preliminary and final approval of the parties' settlement of this matter together with the Coordinated Actions. The following good cause exists for granting the stipulated stay:

1. The parties have engaged in resolution negotiations over the course of several months starting with a mediation on April 27, 2021 and continuing with the assistance of the mediator through July 29, 2021, when the parties reached an agreement to resolve this matter together with the Coordinated Actions through a nationwide class settlement.

2. On July 27, 2021, the Court entered its order granting in part and denying in part Whirlpool's Motion to Dismiss (Doc. 58), resulting in Whirlpool's deadline to answer the remaining claims by August 10, 2021.

3. The parties are presently planning the orderly presentation of the class settlement for preliminary approval to resolve this matter together with the Coordinated Actions, and will

submit a status report to the Court by August 10, 2021, advising of the status of that planning and the proposed schedule to present the settlement for preliminary approval.

4. Given the imminent settlement approval proceedings and the likelihood that Plaintiffs in the Coordinated Actions will file a consolidated amended complaint further coordinating the actions for resolution purposes, the parties are in agreement that Whirlpool's deadline to answer the First Amended Class Action Complaint should be stayed.

Dated: August 3, 2021

s/ Andrew M. Unthank

WHEELER TRIGG O'DONNELL LLP

Galen D. Bellamy
(Admitted *pro hac vice*)
Andrew M. Unthank
(Admitted *pro hac vice*)
370 Seventeenth Street, Suite 4500
Denver, CO 80202
(303) 244-1800
bellamy@wtotrial.com
unthank@wtotrial.com

WINTHROP & WEINSTINE, P.A.

Thomas H. Boyd, #0200517
Kyle R. Kroll, #0398433
Mary S. Riverso, #0400224
225 South Sixth Street, Suite 3500
Minneapolis, MN 55402
(612) 604-6400
tboyd@winthrop.com
kkroll@winthrop.com
mrriverso@winthrop.com

Attorneys for Defendant, Whirlpool Corporation

s/ Harper Segui

MILBERG COLEMAN BRYSON

PHILLIPS GROSSMAN, LLP
800 S. Gay Street, Suite 1100
Knoxville, TN 37929
T: 865-247-0080
F: 865-522-0049
rsoffin@milberg.com
hsegu@milberg.com

Michelle J. Looby
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South 6th Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-844
mlooby@gustafsongluek.com

Attorneys for Plaintiff and Putative Class